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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Secretary Dortch:

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a) of the Federal Communication Commission's regulations, please find enclosed the FCC Form 481 for Bush-Tell, Inc. This form was also filed at the Regulatory Commission of Alaska (RCA) and USAC.

Bush-Tell, Inc. seeks confidential treatment for its financial information pursuant to the Protective Order, Connect America Fund, et al., WC Docket No. 10-90 et al., (Nov. 16, 2012). A redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under 47 C.F.R. §§ 0.457 and 0.459 of the initial § 54.202(a) Five-Year Service Quality Improvement Plan.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC

Shannon M. Heim
4000 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
Phone (612) 486-1586
Fax: (855) 223-7059
Email: sheim@dykema.com

SMHE/ebf
Enclosure

REDACTED – FOR PUBLIC INSPECTION



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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Ms. Dortch:

Pursuant to the Protective Order in *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.* (Nov. 16, 2012) and 47 C.F.R. §§ 0.457 and 0.459, Bush-Tell, Inc., by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, Bush-Tell, Inc. requests confidential treatment of the Five-Year Service Quality Improvement Plan (the "Plan") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), Bush-Tell, Inc. states the following:

1. Identification of the specific information for which confidential treatment is sought.

Bush-Tell, Inc. seeks confidential treatment of the Plan attached to the Form 481 filing accompanying this letter. The Plan contains sensitive financial information about Bush-Tell, Inc. as well as information about Bush-Tell, Inc.'s projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

Ms. Marlene Dortch, Secretary
July 1, 2014
Page 2

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would “customarily be guarded from competitors”¹ and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).²

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by Bush-Tell, Inc. that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

Specifically, the Plan sets forth in detail the services provided by Bush-Tell, Inc. over its existing network including location of customers, as well as planned network improvement and maintenance for 2015 through 2019, including project dates, populations impacted by the improvements and upgrades, and projected capital costs associated with maintaining the network. This information is competitively sensitive information related to the company’s existing network and planned upgrades and maintenance, and would benefit Bush-Tell, Inc.’s competitors if they were able to have access to this information.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the Plan is likely to result in substantial competitive harm to Bush-Tell, Inc. because the Plan could provide competitors with commercially sensitive insights related to Bush-Tell, Inc.’s operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

Bush-Tell, Inc. does not make the Plan or any of the information contained therein publically available in any way. The Plan is only made available to key employees with a direct need-to-know basis. This production has been completed by outside counsel.

¹ 47 C.F.R. § 0.457(d)(2).

² 5 U.S.C. § 522(b)(4).



Ms. Marlene Dortch, Secretary

July 1, 2014

Page 3

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

Bush-Tell, Inc. does not make the Plan available to the public and it has not previously allowed disclosure of the Plan to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The Plan should be treated as confidential for an indefinite period, as Bush-Tell, Inc. will always be subject to competition and the competitive harms associated with the disclosure of the Plan.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.*

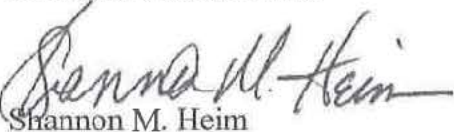
None.

In order to provide adequate protection from public disclosure, Bush-Tell, Inc. requests that the Commission strictly limit distribution of the Plan within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the Plan, Bush-Tell, Inc. requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC



Shannon M. Heim

SMHE/eb1

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL, INC.
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Michael C Burke
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	michael.burke@acsalaska.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)	<input type="checkbox"/>	<input type="checkbox"/>
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420>	Mobile 0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed 0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile 0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<510>	613004AK510.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610>	613004AK610.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	613004AK1010.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet			
<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers (check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	REDACTED - FOR PUBLIC INSPECTION (certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

613004AK112.docx, 613004AK112.xls

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How (USF) was used to improve service quality
 <116> How (USF) was used to improve service coverage
 <117> How (USF) was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

[illegible]

OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400340 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@sacsalaska.net

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	21.5

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	613094
<015>	Study Area Name	BOEH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

[illegible]

(800) Operating Companies

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	611004
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<015>	Study Area Name	BUSH-TELL, INC.
-------	-----------------	-----------------

<020>	Program Year	2015
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
-------	---	-----------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> michael.burke@acsalaska.net

<810> Reporting Carrier Bush-Tell, Inc.

<811>	Holding Company	NA
-------	-----------------	----

<812>	Operating Company	Bush-Tell, Inc.
-------	-------------------	-----------------

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation

Affiliates

<a2>

SAC

<a3>

Doing Business As Company or Brand Designation

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 613004
 <015> Study Area Name BUSH-TELL INC.
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Michael C Burke
 <035> Contact Telephone Number - Number of person identified in data line <030> 9074400540 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> michael.burke@sacsalaska.net

<910> Tribal Land(s) on which ETC Serves

Alaska

<920> Tribal Government Engagement Obligation

613004AK920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes
 to confirm the status described on the attached document(s), on line 920,
 demonstrates coordination with the Tribal government pursuant to
 § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal
 community anchor institutions.
 <922> Feasibility and sustainability planning;
 <923> Marketing services in a culturally sensitive manner;
 <924> Compliance with Rights of way processes
 <925> Compliance with Land Use permitting requirements
 <926> Compliance with Facilities Siting rules
 <927> Compliance with Environmental Review processes
 <928> Compliance with Cultural Preservation review processes
 <929> Compliance with Tribal Business and Licensing requirements.

 Select
(Yes, No,
NA)

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

REDACTED - FOR PUBLIC INSPECTION

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-C986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

Please check this box to confirm no terrestrial backhaul
 <1120> options exist within the supported area pursuant to § 54.313(G)



Please check this box to confirm the reporting carrier offers
 <1130> broadband service of at least 1 Mbps downstream and 256 kbps
 upstream within the supported area pursuant to § 54.313(G)



(1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@csalaska.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.bush-tell.com/home>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BUSH-TELE INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsaalaska.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification (47 CFR § 54.313(b)(1)) ☐

<2011> 3rd Year Certification (47 CFR § 54.313(b)(2)) ☐

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

<2012> 2013 Frozen Support Certification ☐

<2013> 2014 Frozen Support Certification ☐

<2014> 2015 Frozen Support Certification ☐

<2015> 2016 and future Frozen Support Certification ☐

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

<2016> Certification Support Used to Build Broadband ☐

Connect America Phase II Reporting (47 CFR § 54.313(e))

<2017> 3rd year Broadband Service Certification ☐

<2018> 5th year Broadband Service Certification ☐

<2019> Interim Progress Certification ☐

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	613004
<015> Study Area Name	BUSH-TELL TRC.
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Michael C. Burke
<035> Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No)
(Yes/No)

☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒
☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

- (3023) Underlying information subjected to a review by an independent certified public accountant

☐

- (3024) Underlying information subjected to an officer certification.

☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	613004
<015> Study Area Name	BUSH-TELL INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035> Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	613004
<015> Study Area Name	BUSH-TELL INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035> Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Michael C Burke</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Michael C Burke
Name of Reporting Carrier:	BUSH-TELL INC.
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2014
Printed name of Authorized Officer:	Harry Colliver Jr
Title or position of Authorized Officer:	President/General Manager
Telephone number of Authorized Officer:	9076754311 ext.
Study Area Code of Reporting Carrier:	613004 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	BUSH-TELL INC.
Name of Authorized Agent or Employee of Agent:	Michael C Burke
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2014
Printed name of Authorized Agent or Employee of Agent:	Michael C Burke
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	9074400540 ext.
Study Area Code of Reporting Carrier:	613004 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	613004
-------	-----------------	--------

<015>	Study Area Name	HUGH-TELL, INC.
-------	-----------------	-----------------

<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
-------	---	-----------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> michael.bucke@csalaaska.net

<701> Residential Local Service Charge Effective Date	1/1/2014
---	----------

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	613004
<015>	Study Area Name	BOEH-TELL INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Michael C Burke
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074400540 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	michael.burke@acsalaska.net

[illegible]

Bush-Tell, Inc.:	Bush-Tell, Inc.
Study Area Code	613004
Supplemental Data for:	Line 510-Service Quality Standards and Consumer Protection Rules Compliance

Bush-Tell, Inc. will make reasonable efforts to comply with applicable service quality standards as stated in Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan and consumer protection rules as defined in 47 C.F.R. Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft.

Bush-Tell, Inc. adheres to Consumer Protection by complying with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

Bush-Tell, Inc. also adheres to Service Quality Standards by complying with the service standards of the State of Alaska as promulgated in the Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan.

RATES AND RATE STABILITY

New customers are provided rate information at the time they order service. The rate information is prepared based on tariffs which are on file with the state public utility commission and available for inspection at our office. In addition rates are available on Bush-Tell, Inc. website. Notices of rate changes proposed by Bush-Tell, Inc. are communicated to the customers through a bill notice or other comparable means. Bush-Tell, Inc. complies with all state and federal rules applicable to rate changes.

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for service plans Bush-Tell, Inc. will disclose material charges and conditions related to the advertised prices and services. This notice will provide the potential customer with, including if applicable and to the extent the advertising medium reasonably allows: (1) whether nonrecurring installation charges would apply; (2) the monthly fee associated with the service; (3) whether any additional taxes, fees or surcharges apply; (3) the terms and conditions related to receiving a product or service for "free;" and (4) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

TRUTH-IN-BILLING

Bush-Tell, Inc. has long maintained compliance with the FCC's Truth-in-Billing rules as set forth in 47 CFR 64.2401. In part, this requires Bush-Tell, Inc.'s telephone bill must: (1) be accompanied by a brief, clear, non-misleading plain language description of the service or services rendered; (2) identify the service provider associated with each charge; (3) clearly and conspicuously identify any change in service provider; (4) contain full and non-misleading

descriptions of charges; (5) identify those charges for which failure to pay will not result in disconnection of the customer's basic local service; and (6) provide a toll free number for customers to call in order to lodge a complaint or obtain information. Customers' bills will distinguish (1) monthly charges for service and features, and other charges collected and retained by the carrier, from (2) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Bush-Tell, Inc. will not label cost recovery fees or charges as taxes.

READYPROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers and potential customers may access customer service by visiting Bush-Tell, Inc.'s office or by using a toll-free telephone number during normal business hours. Customer service contact information is available at our business office with regular hours posted on the storefront. In addition, this information is available online and on the monthly invoice rendered by Bush-Tell, Inc.

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Bush-Tell, Inc. complies with all state and federal rules regarding the privacy of customer information. Certification of this compliance is provided annually to the FCC.

RESPONSE TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES

Bush-Tell, Inc. will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency. Should the agency require a shorter interval for response, Bush-Tell, Inc. will use its best efforts to expedite the review of the complaint to provide a response which meets the agency-provided target date.

TERMINATION OF SERVICE

Bush-Tell, Inc. follows the state public utility commission's rules for termination of service. Service cannot be terminated without advance notice to the customer. If service is being terminated for non-payment, the customer will have the option to establish a payment plan. So long as the customer adheres to the payment plan, service will not be disconnected. Customers may terminate service at any time and for any reason. Bush-Tell, Inc. does not assess any termination penalty and the customer is simply required to pay for the services which were used while the service was provided.

Bush-Tell, Inc.:	Bush-Tell, Inc.
Study Area Code	613004
Supplemental Data for:	Line 610-Description of Functionality in Emergency Situations

As an initial point, Bush-Tell, Inc. had no service outages during 2012 which met the FCC's threshold for reporting into the Network Outage Reporting System ("NORS").

Bush-Tell, Inc. engages in preventative maintenance programs which help ensure network reliability in all conditions. This includes regular checks on generators, battery back-up, HVAC infrastructure at central office switches, and tree trimming/removal when trees have the potential to take down telephone lines during events of high wind or heavy snow. Access to critical infrastructure (like central office switches) is limited to essential personnel. Spare equipment is maintained in inventory.

Like most local exchange carriers, Bush-Tell, Inc.'s network consists of electronic switching equipment and a network of fiber optics and copper facilities. Each Bush-Tell community is non-contiguous and is not connected by roads, making redundancy between communities extremely expensive.

From a switching standpoint, Bush-Tell, Inc. has one primary switch in each community it serves. The largest threat to switches is the loss of power. To address this, Bush-Tell, Inc. ensures adequate battery back-up is maintained as well as backup generator capacity at its largest exchanges. The following table shows the available battery backup at each exchange as well as backup generator capacity:

Exchange	Generator	Batteries
Aniak	30KW	12 Hrs
Anvik		8 Hrs
Crooked Creek		8 Hrs
Grayling		8 Hrs
Kalskag	10KW	8 Hrs
Red Devil		8 Hrs
Shageluk		8 Hrs
Stoney River		8 Hrs
Sleet Mute		8 Hrs

In cases of emergency, Bush-Tell, Inc.'s management has contact information for all employees. Depending upon the scope of the emergency, Bush-Tell, Inc. may call-in as many employees as necessary to provide continual telecommunications service. When poles are down from emergencies, the Bush-Tell, Inc. works with other utilities attached to the same poles to expedite the repair or replacement of the infrastructure.

In summation, Bush-Tell, Inc. takes preventative measures to plan for emergency situations and also takes steps to mitigate the risk or duration of such events.

Bush-Tell, Inc.:	Bush-Tell, Inc.
Study Area Code	613004
Supplemental Data for:	Line 920-Tribal Government Engagement Obligation

Bush-Tell, Inc. contacted all of the tribal administrators in its service area in order to comply with the Universal Service Transformation Order. Bush-Tell, Inc. contacted the following Traditional Councils by phone to verify the President or Chief and to verify their address. This effort was headed up by Sonya Hill, Bush-Tell's Office Manager and an Alaska Native:

Aniak Traditional Council
PO Box 349
Aniak, AK 99557
President: Wayne Morgan
Tribal Admin: Laura Simeon
Ph # 675-4349

Anvik Traditional Council
PO Box 10
Anvik, AK 99558
Chief: Carl Jerue Jr.
Ph # 663-6346

Holy Cross Tribal Council
PO Box 89
Holy Cross, AK 99602
Chief: Eugene and Tessie Paul
Ph # 476-7207

Shageluk IRA (Indian Reorganization Act.)
PO Box 35
Shageluk, AK 99665
Chief: Election to be held 11-8-12
Ph #473-8239

Grayling IRA (Indian Reorganization Act.)
PO Box 49
Grayling, AK 99590
Chief: Gabriel Nicholi
Ph # 453-5116

Crooked Creek Traditional Council
PO Box 69
Crooked Creek, AK 99575
President: Evelyn Thomas
Ph # 432-2200

Sleetmute Traditional Council
PO Box 109
Sleetmute, AK 99668
President: Sophie Gregory
Ph # 449-4263

Stony River Traditional Council
PO Box SRV
Stony River, AK 99557
President: Mary Willis
Ph # 537-3258

Village of Upper Kalskag
PO Box 50
Upper Kalskag, AK 99607
President: Elections held on Oct. 1st
Tribal Admin: Bonnie Perrson
Ph # 471-2322

Village of Lower Kalskag
PO Box 27
Lower Kalskag, AK 99626
President: Nastasia Levi
Ph # 471-2300

Red Devil Traditional Council
PO Box 27
Red Devil, AK 99656
President: No Council at this time.
Tried and was unable to contact anyone.

Each tribal administrator was informed of Bush-Tell Inc.'s responsibility to work with all tribal offices regarding a variety of topics, and that Bush-Tell, Inc. would be sending out a letter describing those responsibilities. Specifically, Bush-Tell, Inc. informed each entity its intent to have discussions including (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing

services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements. Face to face meetings with each entity were conducted by Doug DeVore, Bush-Tell, Inc.'s Vice President/Assistant General Manager, and Sonya Hill, during the fall of 2013. No specific needs were identified for the communities by the native leaders beyond the efforts already being conducted by Bush-Tell to provide broadband service to the communities.

Bush-Tell, Inc.:	Bush-Tell, Inc.
Study Area Code	613004
Supplemental Data for:	Line 1010-Voice Services Rate Compatibility

Bush-Tell, Inc. certifies that it meets the local voice service rate compatibility requirements. The Residential rate for all Bush-Tell exchanges is \$21.50 a month, which is above the local rate floor of \$20.46 that has been established by the FCC. With state surcharges this rate is \$28.14. The federal \$6.50 SLC brings this residential rate to \$34.64, which is below the two standard deviations from the applicable urban rate for voice service of \$46.96.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0071. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 201 et seq. and subject to federal laws and regulations regarding confidential information. It will be treated as confidential. BORROWER NAME Bush-Tell, Incorporated (Prepared with Audited Data)			
INSTRUCTIONS: Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-3. Report in whole dollars only.		PERIOD ENDING December, 2013	BORROWER DESIGNATION AR0525		
CERTIFICATION We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief. ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES. DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII (Check one of the following)					
<input checked="" type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects.		<input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report.			
Harry Colliver		3/24/2014			
DATE					
PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents	1,003,006	469,932	25. Accounts Payable	68,699	89,947
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments	5,048	5,981
a. Telecom. Accounts Receivable	81,308	106,600	28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt	275,791	325,643
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom. Accounts Receivable	259,525	261,895	32. Income Taxes Accrued		
b. Other Accounts Receivable	38,673	42,611	33. Other Taxes Accrued	2,758	2,299
c. Notes Receivable			34. Other Current Liabilities	25,723	26,578
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)	378,019	450,448
6. Material-Regulated	3,936	3,872	LONG-TERM DEBT		
7. Material-Nonregulated	6,633	6,633	36. Funded Debt-RUS Notes	1,390,828	1,064,474
8. Prepayments	29,728	28,167	37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 thru 9)	1,412,809	939,710	39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Rescquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)	1,390,828	1,064,474
13. Nonregulated Investments	47,707	61,764	OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges	402,749	540,044	48. Other Deferred Credits	17,915	16,970
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)	540,456	609,808	50. Total Other Liabilities and Deferred Credits (47 thru 49)	17,915	16,970
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom. Plant-in-Service	9,443,829	9,769,214	51. Cap. Stock Outstanding & Subscribed	5,000	5,000
19. Property Held for Future Use	50,926	0	52. Additional Paid-in-Capital		
20. Plant Under Construction	60,698	76,650	53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation	8,250,474	8,470,048	55. Other Capital		
23. Net Plant (18 thru 21 less 22)	1,304,979	1,375,816	56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	1,466,482	1,398,442
	3,238,244	2,925,334	58. Total Equity (51 thru 57)	1,471,482	1,393,442
			59. TOTAL LIABILITIES AND EQUITY (35+48+50+58)	3,258,244	2,925,334

Total Equity = 47.63% % of Total Assets

Page 1 of 6

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		AKC525	
		PERIOD ENDING December, 2013	
INSTRUCTIONS- See RUS Bulletin 1744-2			
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM		PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		263,324	246,755
2. Network Access Services Revenues		1,882,186	1,789,078
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues			
5. Miscellaneous Revenues		112,365	110,829
6. Uncollectible Revenues			1,815
7. Net Operating Revenues (1 thru 5 less 6)		2,257,895	2,144,847
8. Plant Specific Operations Expense		966,211	975,826
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		163,479	156,633
10. Depreciation Expense		291,092	249,058
11. Amortization Expense			
12. Customer Operations Expense		73,803	69,374
13. Corporate Operations Expense		777,607	744,626
14. Total Operating Expenses (8 thru 13)		2,272,192	2,195,517
15. Operating Income or Margins (7 less 14)		(14,297)	(50,670)
16. Other Operating Income and Expenses			
17. State and Local Taxes		(12,511)	(11,060)
18. Federal Income Taxes		(50,047)	(44,235)
19. Other Taxes		43	39
20. Total Operating Taxes (17+18+19)		(62,515)	(55,256)
21. Net Operating Income or Margins (15+16-20)		48,218	4,586
22. Interest on Funded Debt		90,429	76,720
23. Interest Expense - Capital Leases			
24. Other Interest Expense			
25. Allowance for Funds Used During Construction			
26. Total Fixed Charges (22+23+24-25)		90,429	76,720
27. Nonoperating Net Income		(8,083)	(4,695)
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income		(36,116)	(1,211)
31. Total Net Income or Margins (21+27+28+29+30-26)		(86,410)	(78,940)
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year		1,552,892	1,466,482
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		1,466,482	1,388,442
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)		0	0
44. Annual Debt Service Payments		318,898	362,506
45. Cash Ratio [(14+20-10-11) / 7]		0.8497	0.8617
46. Operating Accrual Ratio [(14+20+26) / 7]		1.0187	1.0336
47. TIER [(31+26) / 26]		0.0444	-0.0172
48. DSCR [(31+29+10+11) / 44]		0.9254	0.6834

LUMIA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		AK0525	
INSTRUCTIONS - See help in the online application.		PERIOD ENDED	
		December, 2013	
PART I - STATEMENT OF CASH FLOWS			
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		1,003,006
CASH FLOWS FROM OPERATING ACTIVITIES			
2.	Net income		(78,040)
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3.	Add: Depreciation		245,178
4.	Add: Amortization		0
5.	Other (Explain) Corrections: Depreciations 18,721 Accounts Payable 1890 Advance Billis (933) Other Current (3743)		18,845
Changes in Operating Assets and Liabilities			
6.	Decrease/(Increase) in Accounts Receivable		(61,600)
7.	Decrease/(Increase) in Materials and Inventory		64
8.	Decrease/(Increase) in Prepayments and Deferred Charges		(53,734)
9.	Decrease/(Increase) in Other Current Assets		0
10.	Increase/(Decrease) in Accounts Payable		21,243
11.	Increase/(Decrease) in Advance Billings & Payments		933
12.	Increase/(Decrease) in Other Current Liabilities		396
13.	Net Cash Provided/(Used) by Operations		95,168
CASH FLOWS FROM FINANCING ACTIVITIES			
14.	Decrease/(Increase) in Notes Receivable		0
15.	Increase/(Decrease) in Notes Payable		0
16.	Increase/(Decrease) in Customer Deposits		0
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		(276,502)
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits		(945)
19.	Increase/(Decrease) in Capital Stock, Paid-In Capital, Membership and Capital Certificates & Other Capital		0
20.	Less: Payment of Dividends		0
21.	Less: Patronage Capital Credits Retired		0
22.	Other (Explain) Correct other liabilities and deferred credits		1,878
23.	Net Cash Provided/(Used) by Financing Activities		(275,569)
CASH FLOWS FROM INVESTING ACTIVITIES			
24.	Net Capital Expenditures (Property, Plant & Equipment)		(290,411)
25.	Other Long-Term Investments		(14,057)
26.	Other Noncurrent Assets & Jurisdictional Differences		0
27.	Other (Explain) Correct Plant Investment (65492) Plant salvage 3,230 Other long term investment 14,057		(48,205)
28.	Net Cash Provided/(Used) by Investing Activities		(332,673)
29.	Net Increase/(Decrease) in Cash		(533,074)
30.	Ending Cash		469,932

Revision Date 2010

Erickson & Brooks

CERTIFIED PUBLIC ACCOUNTANTS

STEVEN E. PRIBNOW
DANIEL J. WIESEN
KENT P. SPEICHER

2195 NORTH BROAD STREET
P.O. BOX 1270
FREMONT, NEBRASKA 68026-1270

(402) 721-3454
Fax (402) 721-2894
eb-cpa.com

March 3, 2014

To the Board of Directors
Bush-Tell, Inc.
Aniak, Alaska

We have audited the financial statements of Bush-Tell, Inc. for the year ended December 31, 2013, and have issued our report thereon dated March 3, 2014. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards and *Government Auditing Standards*, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated September 18, 2013. Professional standards also require that we communicate to you the following information related to our audit.

Significant Auditing Findings

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by Bush-Tell, Inc. are described in Note 1 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year. We noted no transactions entered into by the Company during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

Management's estimate of the cost study true-up is based on revenue requirements relative to all companies participating in the NECA pool. The revenue requirements are determined using complex formulas using the Company's operating cost to provide service and its rate base of assets used in providing that service. The company used the services of a consulting firm to determine that management's estimates were reasonable in relation to the financial statements taken as a whole.

Management's estimate of depreciable lives and estimated residual value of property and equipment is based on historical Regulatory Commission of Alaska guidelines. We evaluated the key factors and assumptions used to develop the depreciable lives and estimated residual value of property and equipment in determining that it is reasonable in relation to the financial statements taken as a whole.

The financial statement disclosures are neutral, consistent, and clear.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Erickson & Brooks

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. However, the attached schedule summarizes uncorrected misstatements of the financial statements. Management has determined that their effects are immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, professional standards define a disagreement with management as a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated March 3, 2014.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Company's financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Finding or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Company's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

This information is intended solely for the use of the board of directors and management of Bush-Tell, Inc. and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

ERICKSON & BROOKS

Erickson & Brooks

3/2/2014
3:00 PM

Client: 6750 - Bush-Tell, Inc.
Engagement: AUD - Bush-Tell, Inc.(1)
Period Ending: 12/31/2013
Trial Balance: TB
Workpaper: 0500.02 - Passed Journal Entries Report

Account	Description	W/P Ref	Debit	Credit
Passed Journal Entries JE # 36				
Reclassify 2014 ATA dues paid in Dec 2013				
1280.40	Prepaid Expenses	6000.01 dw	5,500.00	
6720.18	Other Expenses-Assoc. Dues			5,500.00
Total			5,500.00	5,500.00

Erickson & Brooks
CERTIFIED PUBLIC ACCOUNTANTS

STEVEN E. PRIBNOW
DANIEL J. WIESEN
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FREMONT, NEBRASKA 68028-1270

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Independent Auditor's Report on Compliance with Aspects of Contractual
Agreements and Regulatory Requirements for Telecommunication Borrowers

Board of Directors
Bush-Tell, Inc.
Aniak, Alaska

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Bush-Tell, Inc., which comprise the balance sheet as of December 31, 2013, and the related statements of income, changes in stockholders' equity and cash flows for the year ended, and the related notes to the financial statements, and have issued our report thereon dated March 3, 2014. In accordance with *Government Auditing Standards*, we have also issued our report dated March 3, 2014, on our consideration of Bush-Tell, Inc.'s internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. No reports other than the reports referred to above and our schedule of findings and recommendations related to our audit have been furnished to management.

In connection with our audit, we noted Bush-Tell, Inc. failed to meet the TIER ratio requirement, resulting in Bush-Tell, Inc. failing to comply with the covenants of the loan documents. No other items came to our attention that caused us to believe that terms, covenants, provisions, or conditions of their loan, grant, and security instruments as set forth in 7 CFR Part 1773, *Policy on Audits of Rural Utilities Service Borrowers*, Section 1773.33 and clarified in the RUS policy memorandum dated February 7, 2014, insofar as they relate to accounting matters as enumerated below. However, our audit was not directed primarily toward obtaining knowledge of noncompliance. Accordingly, had we performed additional procedures, other matters may have come to our attention regarding Bush-Tell, Inc.'s noncompliance with the above-referenced terms, covenants, provisions, or conditions of the contractual agreements and regulatory requirements, insofar as they relate to accounting matters. In connection with our audit, we noted no matters regarding Bush-Tell, Inc.'s accounting and records to indicate that Bush-Tell, Inc. did not:

- Maintain adequate and effective accounting procedures;
- Utilize adequate and fair methods for accumulating and recording labor, material, and overhead costs, and the distribution of these costs to construction, retirement, and maintenance or other expense accounts;
- Reconcile continuing property records to the controlling general ledger plant accounts;
- Clear construction accounts and accrue depreciation on completed construction;
- Record and properly price the retirement of plant;
- Seek approval of the sale, lease or transfer of capital assets and disposition of proceeds for the sale or lease of plant, material, or scrap;
- Maintain adequate control over materials and supplies;
- Prepare accurate and timely Financial and Operating Reports;

Erickson & Brooks

- Obtain written RUS approval to enter into any contract for the management, operation, or maintenance of the borrower's system if the contract covers all or substantially all of the telecommunication system;
- Disclose material related party transactions in the financial statements, in accordance with requirements for related parties in generally accepted accounting principles;
- Record depreciation in accordance with RUS requirements (See RUS Bulletin 183-1, Depreciation Rates and Procedures);
- Comply with the requirements for the detailed schedule of deferred debits and deferred credits; and
- Comply with the requirements for the detailed schedule of investments.

This report is intended solely for the information and use of the board of directors, management, and the RUS and supplemental lenders and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

ERICKSON & BROOKS

Erickson & Brooks

Fremont, Nebraska
March 3, 2014

Bush-Tell, Inc. (SAC 613004)

Form 481 Five Year Service Quality Improvement Plan

2015 Program Year

The chart below summarizes the overall operating and capital costs Bush-Tell anticipates incurring to offer voice and broadband service in its service area.

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
<u>Capital Expenditures</u>					
2110 Land and General Support					
2210 Central Office Switching					
2230 Central Office Transmission					
2410 Cable and Wire Facilities	\$				
Total Capital Expenditures	\$				
<u>Operating Expenditures</u>					
Plant Specific	\$				
Plant Nonspecific	\$				
Depreciation	\$				
Customer Operations	\$				
Corporate Operations	\$				
Total Operating Expenditures	\$				

[REDACTED]

[REDACTED]

[REDACTED]

In evaluating any decisions to deploy broadband to its remaining communities Bush-Tell is following the guidance defined by the FCC per the 3RD Order on Reconsideration at Paragraph 46:

46. We appreciate the concerns raised by the Alaska Rural Coalition and ACS that it may not be cost-effective to serve certain customers due to the high cost of backhaul. Rather than granting a blanket exemption of the broadband obligations established for rate-of-return companies in the *USF/ICC Transformation Order*, we clarify, as the Alaska Rural Coalition requests, that our current rules provide sufficient flexibility to take into account any unique circumstances that may impact the ability of rate-of-return companies to extend broadband to their customers, including backhaul costs. As the Coalition notes, rate-of-return carriers are required to provide service meeting the specified characteristics on *reasonable* request, which, the Commission explained in the *Order*, was an obligation similar to the voice deployment obligation many of those carriers were already subject to. This obligation, enforced in the first instance by the relevant ETC-designating authority (generally the state), permits these entities to take into account backhaul costs or other unique circumstances that may make it cost-prohibitive to extend service to particular customers, in Alaska or any other area. We intend to carefully monitor developments in this regard and will consider making further clarifications or revisions if necessary.

[REDACTED]

Bush Tell 5 year build out plan narrative

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NETWORK IMPROVEMENT PROJECTS

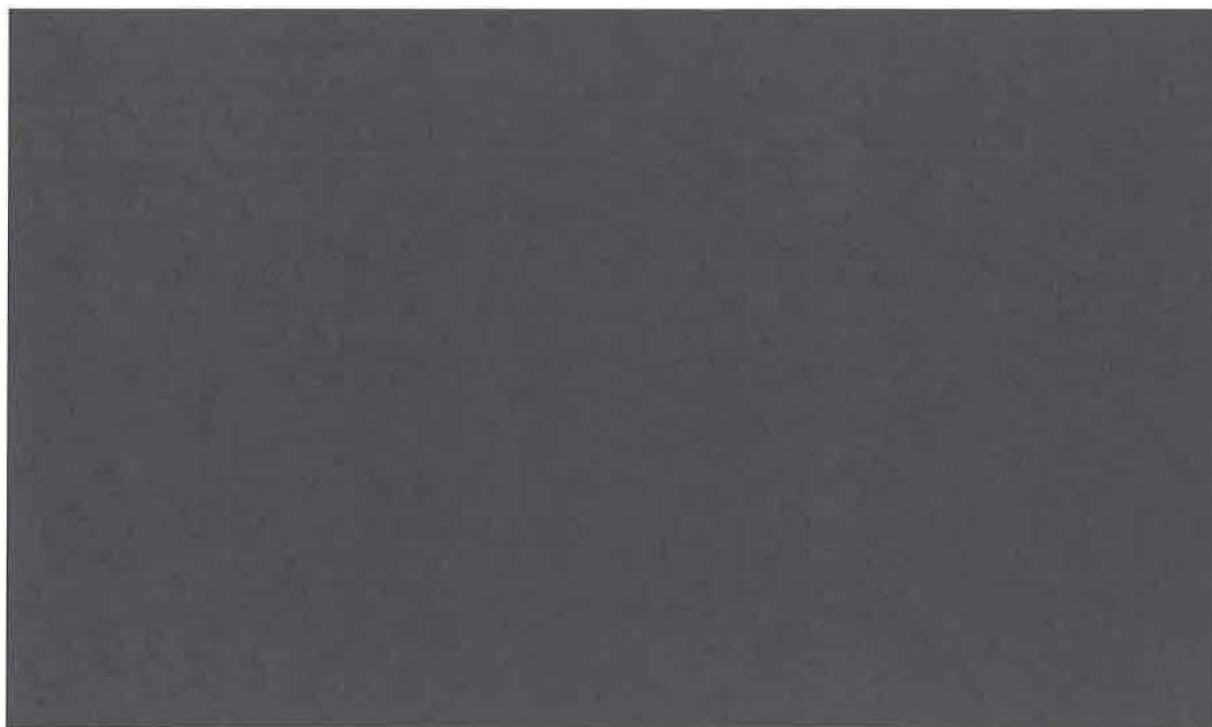
[illegible]

NETWORK IMPROVEMENT PROJECTS

MAP REF.	WIRE CENTER NAME	DESCRIPTION of IMPROVEMENT	COST ESTIMATE	Estimated Project build Year					
	A	Loan/Grant		2015	2016	2017	2018	2019	2020
									0
	Microwave System	Secure land, Permits and Environmental impact studies							
	Aniak								
	Gibraltar Point								
	Oguahayook Ridge								
	Crooked Creek								
	George Town								
	Red Devil								



REDACTED - FOR PUBLIC INSPECTION

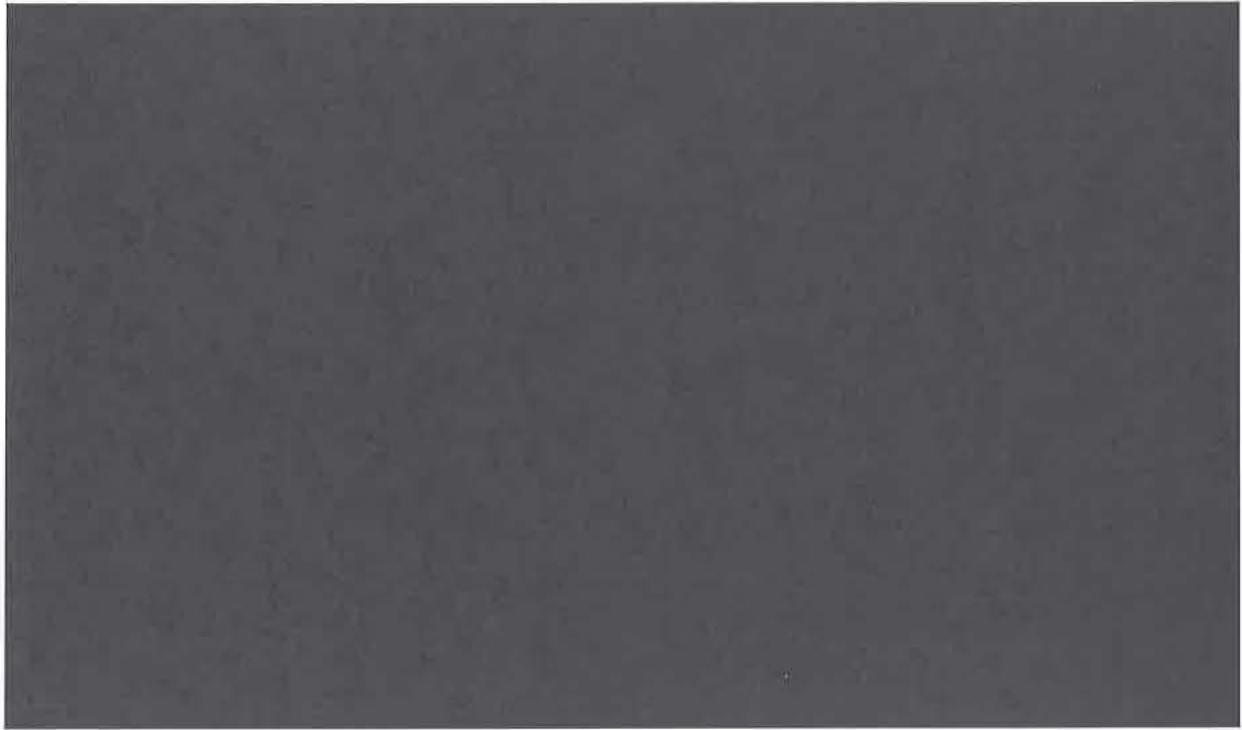


REDACTED - FOR PUBLIC INSPECTION

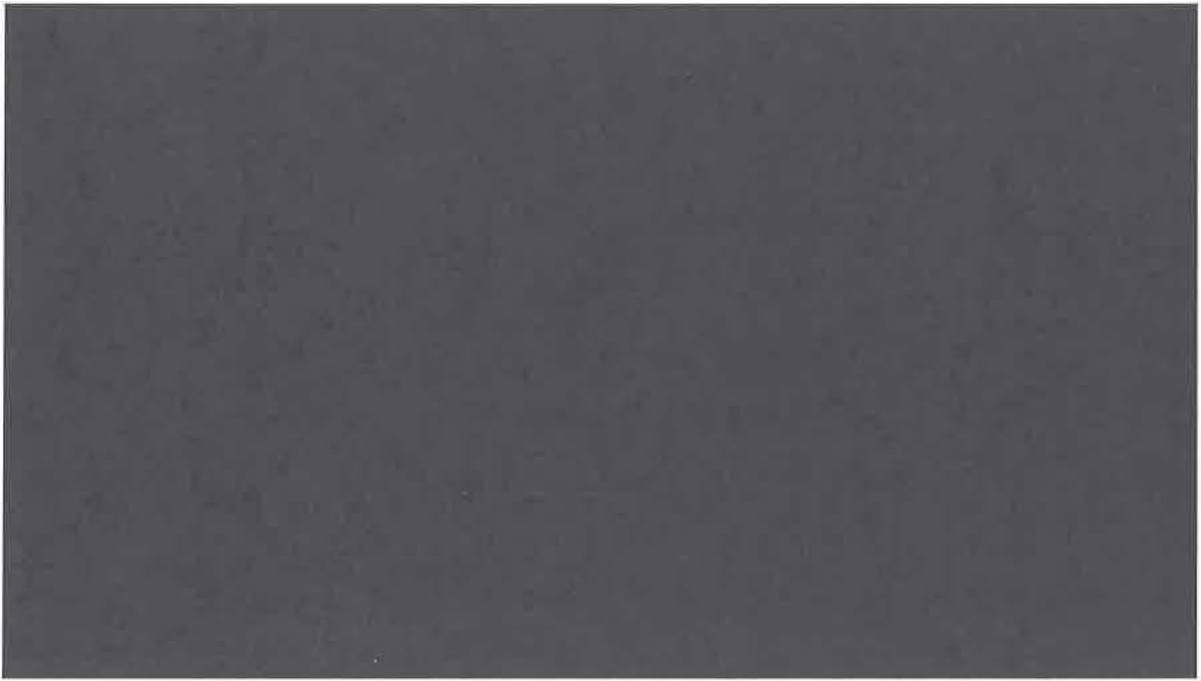




REDACTED - FOR PUBLIC INSPECTION



REDACTED - FOR PUBLIC INSPECTION



REDACTED - FOR PUBLIC INSPECTION

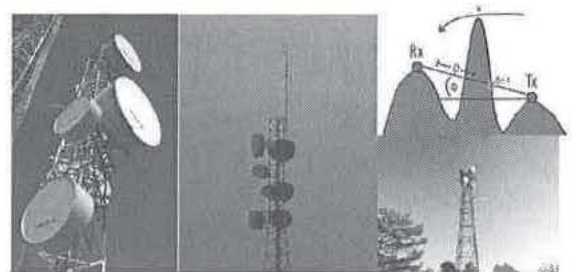
MICROWAVE RADIO SYSTEM FEASIBILITY STUDY

January 2013

For



Prepared by



MICROWAVE FEASIBILITY STUDY BUSH TEL

NARRATIVE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SCOPE:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PATH DESIGN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

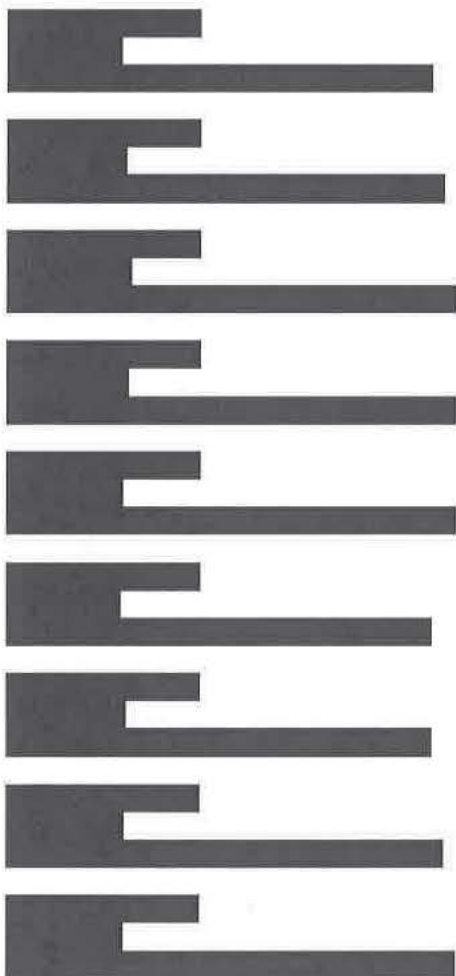
[REDACTED]

[REDACTED]

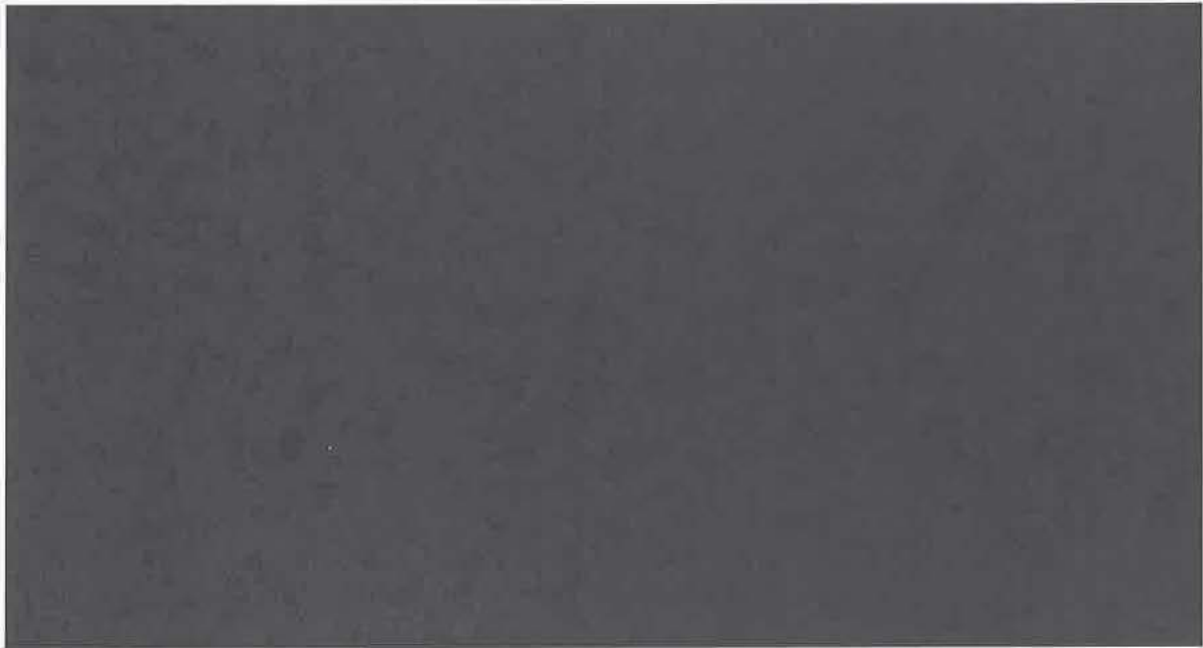
PROPOSED ROUTE



PROPOSED TOWER LOCATIONS



PATH INFORMATION



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

LAND STATUS MAP



REDACTED - FOR PUBLIC INSPECTION

RECOMMENDATIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]